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UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

:

Brad Wilhelm : Case No.: 20-12602(AMC)

:

Debtor : Chapter 13

EXPEDITED MOTION TO RECONSIDER THE JUNE 29, 2020 ORDER DISMISSING THE CHAPTER 13 CASE

Comes Now, Brad Wilhelm, hereinafter referred to as "Debtor" and move this Honorable Court to vacate its June 29,2020 Order Dismissing the instant matter and in support thereof aver the following:

- 1. The above captioned bankruptcy matter was filed as a Chapter 13 on or about June 11, 2020.
 - 2. The Chapter 13 bankruptcy matter was assigned case number 20-12602.
- 3. The Debtor's case was dismissed on June 29, 2020 for failure to file the Schedules, Statements and related documents.
- 4. Due to the logistical constraints of COVID-19, the Debtor had difficulty getting documents signed and then returned.
- 5. The deadline to file the remaining documents was June 26, 2020 and the Debtor provided those documents two business days later on June 29, 2020.
- 6. The Debtor will file the remaining schedules and documents in furtherance of this motion.
- 7. It is humbly requested that an expedited hearing be granted here, as the Debtor's home is listed for Sheriff Sale in August.

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WHEREFORE, for the reasons stated herein, the Debtor respectfully requests that this Honorable Court Reconsider its June 29, 2020 Order dismissing the instant matter.

Respectfully submitted,

Dated: June 29, 2020

/s/ Brad J. Sadek, Esquire Brad J. Sadek, Esquire Sadek and Cooper 1315 Walnut Street Suite 502 Philadelphia, PA 19107